



Mr. Sebastian Roberts
General Manager
Regulatory Affairs – Electricity
Australian Competition and Consumer Commission

Dear Sir

Further to my verbal submission at the conference in Melbourne 19th January 2005 I submit that the exclusion from the derogation proposed for sub 160 MWh pa customers in Victoria that have remotely read interval meters should be extended to include customers in embedded networks who have interval meters that may not be read remotely.

The rationale is that embedded networks that have implemented a system that uses manually read interval meters in the embedded networks are likely to be able to efficiently provide meters, read meters and provide data for all consumers in the embedded network and this can provide consumers who choose to purchase their energy from a retailer other than the embedded network operator with a more cost effective metering and data management solution than would be the case if the LNSP is forced (by the derogation) to install and read meters in the embedded network.

The derogation is the restriction that would prevent customers of retailers other than the embedded network operator from benefiting from the economies of scale achieved by a system that has been implemented in the embedded network.

Please consider this extension to the exclusion from the derogation.

Kind regards

A handwritten signature in black ink, appearing to read 'D. Etchells', with a small flourish at the end.

Dennis Etchells
Director